## IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA CC 201202821

V.

MATTHEW EBO JUDGE LAZZARA

MOTION FOR PRIVATE INVESTIGATOR

ON BEHALF OF: Matthew Ebo

ATTORNEY: Diana Stavroulakis, Esq. PA ID #59255 262 Elm Court Pittsburgh, PA 15237

412-600-8608 Diana@Stavroulakislaw.com

2018 JUN 29 PM I2: 59

## IN THE COURT OF COMMON PLEAS OF ALLGHENY COUNTY, PENNSYLVANIA CRIMINAL DIVISION

COMMONWEALTH of PENNSYLVANIA

CC 201202821

v.

**MATTHEW EBO** 

JUDGE LAZZARA

### MOTION FOR PRIVATE INVESTIGATOR

AND NOW comes the Defendant, Matthew Ebo, by and through his attorney Diana Stavroulakis, Esquire, who presents the within Motion for Private Investigator, and in support thereof states the following:

- 1. Matthew Ebo (Ebo), an incarcerated individual serving a sentence in the above-captioned case, has been granted *In Forma Pauperis* status.

  Counsel was appointed to represent Ebo with his pending Post-Conviction Relief Act (PCRA) Petition.
- 2. Based upon counsel's review of the record, discussions with her client, and preliminary discussions with Patrick K. Nightengale, Esquire, who is representing Ebo's co-defendant from trial, Thaddeus Crumbley (Crumbley), on a pending PCRA Petition, it has become apparent that

Respondents' Exhibit 64

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the services of a private investigator are necessary to assist in locating

and interviewing Robert Raglin - a proposed eyewitness to the

underlying homicide.

3. Counsel represents to this Honorable Court that if this request is

granted, the funds will be used to pay for the services of Ron Getner,

who has already been contacted to assist with locating and interviewing

this witness in Crumbley's case. By using allotted funds for the same

investigator, counsel submits that it would spare duplication of efforts

and the information obtained would be jointly valuable to both Ebo and

Crumbley on this specific issue within their respective PCRA Petitions.

WHEREFORE, counsel respectfully requests that this Honorable Court

appoint Ron Getner of R.J. Getner and Associates to assist counsel in this matter.

Respectfully Submitted,

Diana Stavroulakis, Esq.

# IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA	CC 201202821
v.	
MATTHEW EBO	JUDGE LAZZARA
ORDER OF COURT	
AND NOW, to-wit, this	day of, 2018,
upon consideration of Defendant's Motion for Private Investigator, it is hereby	
ORDERED, ADJUDGED and DECREED that said Motion is GRANTED. The	
Court authorizes \$500.00 for the services of private investigator Ron Getner of R.J.	
Getner and Associates.	
BY THE COURT:	

### **CERTIFICATE OF COMPLIANCE**

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records Of The Appellate And Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Date: June 29, 2018

Diana Stavroulakis, Esquire

Submitted by:

PA ID #59255 262 Elm Court

Pittsburgh, PA 15237

#### CERTIFICATE OF SERVICE

I, undersigned counsel, do hereby verify and state that a true and correct copy of the attached Motion has been served upon the following individuals, this 29<sup>th</sup> day of June 2018, as follows:

### Service by Hand-Delivery:

Hon. Beth A. Lazzara Court of Common Pleas 509 Courthouse 436 Grant Street Pittsburgh, PA 15219

Ron Wabby, Esquire District Attorney's Office 436 Grant Street 401 Courthouse Pittsburgh, PA 15219

Dept. of Court Records – Criminal Division Allegheny County Courthouse, 1<sup>st</sup> Floor 436 Grant Street Pittsburgh, PA 15219

Respectfully Submitted:

Diana Stavroulakis